

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEC 14 2022

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
QUINN TURNER,)
)
Defendant.)

4:22CR714 MTS/JMB

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Matthew A Martin, Assistant United States Attorney for said District, and moves the Court to order Defendant Quinn Turner detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Title 18, United States Code, Section 3142(g) provides factors that the Court must consider in determining whether to order Defendant detained pending trial. These factors include: (a) the nature and circumstances of the offense charged; (b) the weight of the evidence against Defendant; (c) Defendant's criminal history and characteristics; and (d) the danger that would be posed by Defendant's release to any particular individual or the community as a whole.

2. Defendant is charged with carjacking, in violation of Title 18, United States Code, Section 2119, and possessing and brandishing a firearm in furtherance of a crime of violence, in violation of Title 18, United States Code, Section 924(c). The 924(c) offense creates the

presumption that no condition or combination of conditions of release will assure Defendant's appearance and the safety to the community. Title 18, United States Code, Section 3142(e)(3).

3. These charges stem from Defendant's arrest on November 13, 2022. That evening, a GMC Terrain was taken during a carjacking that occurred on the BP lot located on the northwest corner of Russell and 7th Street in the Soulard neighborhood. Surveillance video from the BP station shows the driver of the Terrain enter the lot, park near the front door of the business, and enter the store. Seconds later, a Chevrolet Malibu and Nissan Rogue pull onto the BP lot together and stop parallel to each other at gas pumps directly behind the Terrain. The Malibu and Rogue next move forward into parking spots on either side of the Terrain just before the driver returns to his car. Three men—two from the backseat of the Rogue and one from the backseat of the Malibu—then rush the driver of the Terrain. Surveillance shows that two of the men are armed as they order the driver of the Terrain to the ground and take his wallet and car keys. After taking the driver's property, the two men from the Rogue enter the Terrain and the man from the Malibu returns to backseat before the Rogue, Terrain, and Malibu leave the lot and head north on 7th St.

4. Detectives assigned to the St. Louis Metropolitan Police Department's Anti-Crime Task Force utilized spike strips to stop the Malibu as it travelled north on 7th St. near Park Avenue immediately after the carjacking. Defendant was the driver. Co-defendant Jaylen Mays was the front seat passenger. And a juvenile wearing the same clothing as the individual who possessed a firearm while ordering the driver of the Terrain to the ground was in the backseat. The detectives located a Glock 22, .40 caliber semiautomatic pistol on the front passenger seat. The juvenile was in possession of the driver of the Terrain's wallet. The detectives also confirmed that the Malibu had been taken in a carjacking that occurred in the downtown business district just a week earlier.

5. Nine days before the carjacking, Defendant pled guilty to aggravated unlawful use of a weapon in Madison County, Illinois, Case No. CR001768. In that case, he was stopped in a car with the same two men involved in this incident: co-defendant Jaylen Mays and the juvenile. Defendant was on probation for that offense at the time he was arrested in this case.

6. The facts and circumstances of this case show that Defendant is a danger to the surrounding community. He participated in a carjacking while driving a car that was taken days earlier in a separate carjacking, all just a week after he pled guilty to a gun case in the State of Illinois. This alone warrants detention.

WHEREFORE, the Government requests that this Court order Defendant detained prior to trial, and further order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

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